

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

In re:

Case No. 13-02027-hb

Jerry (NMN) Williams  
Gwendolyn G. Williams

Chapter 13

Debtors

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RESPONSE TO CREDITOR'S RESPONSE TO NOTICE OF FINAL CURE PAYMENT

The above-named debtors now come before this Honorable Court by and through their undersigned counsel to respond to the creditor's response to notice of final cure payment as follows: Debtors' counsel has reviewed the creditor's response and accounting with the debtors, who dispute that accounting. The creditor listed on the response is U.S. Bank, et al. The servicer for the mortgage in the beginning of the chapter 13 case was Selene Finance. On 12-28-17, the debtors received correspondence from BSI Financial Services, identifying itself as the mortgagee's new servicer, and instructing the debtors to not pay Selene, but to instead pay BSI. The debtors began paying BSI. However, in his meeting with the debtors, the undersigned counsel discovered that the debtors had continued to use the prior servicer's account number of 660076 as opposed to the new servicer's account number of 1461660076. Therefore, part of the discrepancy may be due to the debtors' payments from 1/1/18 through 7/1/18, identified as "due" on creditor's accounting, perhaps not having been accounted for. Although, the debtors advise they used the wrong account number, they state they sent the payments to the correct BSI address.

Another source of conflict is that correspondence forwarded to debtors on 12/28/17 reflected an unpaid principal balance of \$31,015.14 with a "total debt inclusive of all past due interest and fees" of \$33,561.35. The difference between those two numbers is \$2,546.21. Based upon this letter alone, it does not appear that the creditor's accounting of missed payments up to the date of 12/28/18 is correct, especially since its last page shows 16 missed payments of \$615.78 each, which equals \$9,852.48 as of 1/1/18, which is inconsistent with the \$2,546.21 arrearage as reflected on the 12/28/17 correspondence.

In short, the last page of the creditor's accounting attached to its response reflects that the debtors are 23 payments past due as of the 7/19/18 date of its response. For the reasons stated above, the debtors ask the Court to inquire into the matter, and provide whatever relief it deems just and proper. This matter has been scheduled for hearing on October 18, 2018. The debtors ask the creditor to review the matter, based upon the information provided in this response that includes the first two pages of the creditor's servicer's (BMI) correspondence of 12/28/17.

/s/ Robert H Cooper *RHC*

Robert H Cooper DCID#5670

The Cooper Law Firm

150 Milestone Way, Suite B

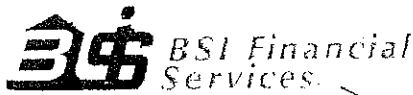
Greenville, SC 29615

864-271-9911 phone

864-232-5236 facsimile

[Rhcooper@thecooperlawfirm.com](mailto:Rhcooper@thecooperlawfirm.com)

Dated this 26<sup>th</sup> day of September, 2018



314 S Franklin St. / Second Floor  
PO Box 517  
Titusville, PA 16354  
800-327-7861  
814-217-1366 Fax  
<https://myloanweb.com/BSI>

90885-1.3 0 156-1.7 2oz

12-28-2017

Sent via First Class Mail

New Account Number: 1461660076

Old Account Number: 660076X

Property Address: 105 IROQUOIS DR  
GREENWOOD SC 29646

 GWENDOLYN WILLIAMS  
105 IROQUOIS DR  
GREENWOOD SC 29646



*payoff:*

*Duke-*

## NOTICE OF SERVICING TRANSFER

The servicing of your mortgage loan is being transferred to BSI Financial Services, effective 12-18-2017. The transfer of servicing does not affect any term or condition or the mortgage loan other than terms directly related to the servicing of the loan.

### WHAT THIS MEANS FOR YOU

After this date, BSI Financial Services will be collecting your mortgage loan payments from you. As referenced above, your loan number may have changed; however, nothing else about your mortgage loan will change.

SELENE FINANCE, your prior servicer, was collecting your payments. SELENE FINANCE will not accept any payments received by you after the day preceding 12-18-2017, at which point BSI Financial Services, as your new servicer, will start accepting payments received from you going forward.

Customers can send all payments due on or after 12-18-2017, to BSI Financial Services at this address:

Via First Class Mail

BSI Financial Services  
PO Box 679002  
Dallas, TX 75267-9002

Via Priority or Overnight Mail

BSI Financial Services  
Lockbox Number 679002  
1200 E. Campbell Rd. Ste. 108  
Richardson, TX 75081

If you have any questions for either your prior servicer, SELENE FINANCE, or your new servicer, BSI Financial Services, about your mortgage loan or this transfer, please contact them using the information below:

Prior Servicer

SELENE FINANCE  
Customer Care  
9990 RICHMOND AVE STE 400 SOUTH  
HOUSTON TX 77042  
877-735-3637

New Servicer

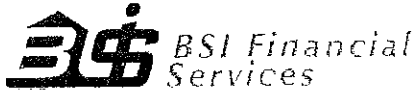
BSI Financial Services  
Customer Care  
314 S Franklin St, 2nd Floor  
Titusville, PA 16354  
800-327-7861

*FAX:*  
*814-217-1366*  
*ATTN:*  
*Duke - 6881*

Under Federal law, during the 60-day period beginning on the effective date of the transfer of the loan, a loan payment received by your old servicer on or before its due date (including any grace period allowed under the mortgage loan instruments) may not be treated by the new servicer as late, and a late fee may not be imposed on you.

This letter is being sent on behalf of BSI Financial Services by its servicing agent, BSI Financial Services.  
BSI Financial Services is a licensed mortgage servicer and debt collector, BSI Financial Services BSI NMLS # 38078

If you have filed a bankruptcy petition and there is an "automatic stay" in effect in your bankruptcy case or you have received a discharge of your personal liability for the obligation identified in this letter, we may not and do not intend to pursue collection of that obligation from you personally. If either of these circumstances apply, this notice is not and should not be construed to be a demand for payment from you personally. Unless the Bankruptcy Court has ordered otherwise, we will continue to collect payments from you, and we will file whatever liens or judgments are necessary to ensure the obligation remains unimpaired.



314 S Franklin St. / Second Floor  
PO Box 517  
Titusville, PA 16354  
800-327-7861  
814-217-1366 Fax  
<https://myloanweb.com/BSI>

12-28-2017

RE: Account Number: 1461660076  
Property Address: 105 IROQUOIS DR  
GREENWOOD SC 29646

GWENDOLYN WILLIAMS  
105 IROQUOIS DR  
GREENWOOD SC 29646

Dear Borrower:

Welcome to BSI Financial Services. The servicing of your loan with SELENE FINANCE has been transferred to BSI Financial Services, and BSI Financial Services is servicing the loan on behalf of the current creditor SCIG SERIES III TRUST, to whom the debt is owed.

As of the date of this letter, your total unpaid principal balance is \$31,015.14 due to SCIG SERIES III TRUST, and your escrow account balance is \$-2,430.71. Your next payment due is in the amount of \$617.14. Your current interest rate is 4.90%.

The total debt inclusive of all past due interest and fees, if any, is \$33,561.35. Because of interest, late charges, and other charges that may vary from day-to-day, the amount due on the day you pay may be greater; therefore, if you pay the amount shown above, an adjustment may be necessary after we receive your payoff funds. **Please contact BSI Financial Services at 800-327-7861 within 48 hours of when you intend to remit payoff funds to confirm the payoff amount.** We will inform you of any adjustments prior to posting the payoff funds.

For further information, please write to us at the address listed above or call us toll-free at 800-327-7861. Monday - Friday 8:00 a.m. - 11:00 p.m. (ET) and Saturday 8:00 a.m. - 12:00 p.m. (ET).

Unless you notify this office within thirty (30) days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within thirty (30) days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of the judgment and mail you a copy of the judgment or verification. Upon your written request for the name and address of the original creditor within the thirty (30) day period after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor. Your loan may be sold by the current creditor to another party at any time.

A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt. Please send the written request to:

BSI Financial Services  
Attn: Customer Care  
314 S Franklin St, Second Floor  
PO Box 517  
Titusville, PA 16354

BSI Financial Services may report information about your account to credit bureaus. Late payments, missed payments or other defaults on your account may be reflected in your credit report. You have the right to dispute the accuracy of the information reported by submitting a Qualified Written Request. Submitting a Qualified Written Request does not relieve the customer of the responsibility of making their scheduled payments.

This letter is being sent on behalf of BSI Financial Services by its servicing agent, BSI Financial Services.  
BSI Financial Services is a licensed mortgage servicer and debt collector. BSI Financial Services BSI NMLS # 38078

If you have filed a bankruptcy petition and there is an "automatic stay" in effect in your bankruptcy case or you have received a discharge of your personal liability for the obligation identified in this letter, we may not and do not intend to pursue collection of that obligation from you personally. If either of these circumstances apply, this notice is not and should not be construed to be a demand for payment from you personally. Unless the Bankruptcy Court has ordered